
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
: :
v. : Mag. No. 24-9021
: :
CHARLES A. GALLO : **CRIMINAL COMPLAINT**
: :
: : **Filed Under Seal**

I, Gregory T. Botti, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

by phone_____
Gregory T. Botti, Postal Inspector
United States Postal Inspection Service

Postal Inspector Botti attested to the facts of this application telephonically pursuant to F.R.C.P. 4.1(b)(2)(A) on January ___, 2024.

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

s/Cathy L. Waldor 1/5/24
Signature of Judicial Officer

ATTACHMENT A

Count One
(Wire Fraud)

From in or around March 2022 through in or around March 2023, in the District of New Jersey and elsewhere, the defendant,

CHARLES A. GALLO,

did knowingly and intentionally devise a scheme and artifice to defraud Victim-1 and Victim-2, and to obtain money and property from Victim-1 and Victim-2 by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing this scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds.

In violation of Title 18, United States Code, Sections 1343 and 2.

ATTACHMENT B

I, Gregory T. Botti, am a Postal Inspector with the United States Postal Inspection Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

BACKGROUND

1. At all times relevant to this criminal complaint:
 - a. Charles A. Gallo (“GALLO”) resided in the District of New Jersey and was an employee of a public library located in Bergen County, New Jersey (the “Library”).
 - b. Victim-1 and Victim-2 (collectively, the “Victims”) were married and resided in Bergen County, New Jersey.
 - c. GALLO worked as the Victims’ part-time personal assistant.
 - d. “Company-1” was a web-based financial services platform used to facilitate payment for goods and services via online money transfer. Company-1 allowed customers to link credit cards to registered Company-1 accounts.

2. As set forth below, GALLO used his position as the Victims’ part-time assistant to engage in a fraudulent scheme to misappropriate approximately \$2,900,000 from the Victims’ accounts, which he controlled.

The Scheme to Defraud

3. In and around 2018, the Victims hired GALLO to work as a part-time personal assistant at their residence. His duties included managing the Victims’ monthly bills and banking and assisting them with email and other computer/technology-related issues. Accordingly, the Victims gave GALLO access to their personal bank accounts, credit card accounts, email, Company-1 account, and other online retail accounts.

4. As part of his scheme to defraud and without authorization, GALLO routinely used the Victims’ ATM card to withdraw large amounts of money, opened a line of credit, cashed checks made payable to himself drawn on the Victims’ bank accounts, and used the Victims’ credit cards to purchase computer

equipment, gaming systems, collectible items from online retailers, and other unauthorized transactions.

5. After making these purchases, GALLO typically shipped the items in his own name via the United States mail or a commercial carrier to his home address in Hawthorne, New Jersey (the “GALLO Residence”) or to the Library. GALLO also shipped items to addresses in Bergen County, Passaic County, and elsewhere.

6. Proof of these shipments was often sent to Victim-1’s email account, which GALLO controlled.

7. Between in and around October 2022 and in and around March 2023, GALLO used the Victims’ Company-1 account, which was linked to several of their credit cards, for over \$2 million in unauthorized transactions.

Representative Fraudulent Transactions

8. In or around the dates set forth below, GALLO used the Victims’ Company-1 account, linked to several of the Victims’ credit cards, to cause the following unauthorized transactions (all dates and figures are approximate):

Date(s)	Total Unauthorized Transactions
11/2/22 – 11/6/22	\$56,062
11/12/22	\$24,525
12/14/22 – 12/23/22	\$26,908
2/11/23 – 2/14/23	\$33,722

9. GALLO caused all these and other transactions to be made without the Victims’ knowledge or authorization. To continue fraudulently using the Victims’ credit cards, GALLO siphoned funds from the Victims’ bank accounts to pay down the balances each month.

10. GALLO caused all these transactions to be made without authorization from Victim-1 or Victim-2, and in total, GALLO’s conduct described herein resulted in a loss of approximately \$2,900,000.